



**MEMO ENDORSED**

June 12, 2020

Hon. Katherine Polk Failla  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: United States v. Brent Borland, 18 Cr. 487 (KPF)**

Dear Judge Failla,

In our report to the Court two weeks ago, we indicated that today we would be filing a supplemental submission relating to the loss calculation dispute briefed by prior counsel. With the consent of the government, we respectfully request an extension of time to file until Tuesday, June 16, 2020.

Mr. Madiou and I have worked diligently to complete the submission, but in the last couple of days have received a trove of documents that may prove relevant to the filing. Moreover, our communications with our client are limited to phone calls, which has hampered somewhat our ability to jointly produce this brief by today. However, the additional requested days should allow for sufficient time to complete the submission.

Thank you for your consideration.

Respectfully,

/s/

Florian Miedel  
Christopher Madiou  
*Attorneys for Brent Borland*

Cc: All Counsel

Application GRANTED.

SO ORDERED.

Dated: June 12, 2020  
New York, New York

A handwritten signature in blue ink that reads "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE